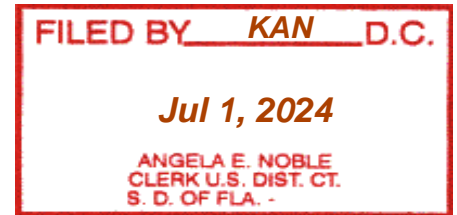


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:24mj03324 Goodman

IN RE SEALED COMPLAINT  
\_\_\_\_\_ /

**CRIMINAL COVER SHEET**



1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
4. Did this matter involve the participation of or consultation now Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

By:

A handwritten signature in black ink, appearing to read "Abbie D. Waxman", is written over a horizontal line.

ABBIE D. WAXMAN  
Assistant United States Attorney  
Florida Bar No.: 109315  
99 N.E. 4th Street, 5th Floor  
Miami, Florida 33132  
(305) 961-9240  
Abbie.Waxman@usdoj.gov

UNITED STATES DISTRICT COURT

for the  
Southern District of Florida

United States of America  
v.

Clementa Johnson

*Defendant.*

Case No. 1:24mj03324 Goodman

**CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of on or about June 21-23, 2024 in the county of Miami-Dade in the  
Southern District of Florida, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. § 2261A

Stalking

18 U.S.C. § 924(c)(1)(A)

Use of a Firearm in furtherance of a crime of violence

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.



*Complainant's signature*

Conor Goepel, Special Agent, FBI

*Printed name and title*

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Face Time

Date: 7/1/24



*Judge's signature*

City and state: Miami, Florida

Hon. Jonathan Goodman, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

Your Affiant, Conor S. Goepel, being duly sworn, deposes and states as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent for the Federal Bureau of Investigation (“FBI”) currently assigned to the Violent Crimes/Fugitive Task Force in the Miami Division. I have been an FBI Special Agent since September 2021 and have been assigned to the Miami Division since February 2022. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to conduct investigations of, and to make arrests for, federal offenses. As a Special Agent for the FBI, my duties involve the investigation of a variety of violations of federal offenses, including, but not limited to, bank robberies, Hobbs Act robberies, extortion, and murder for hire.

2. I am currently a member of the South Florida Violent Crime Task Force. As part of my professional duties and responsibilities, I have become familiar with the investigative methods and enforcement of violent crimes pertaining to state and federal laws. I have also become versed in methodologies and practices employed by individuals and groups who commit violent crimes.

3. The facts contained in this Affidavit are based on my personal knowledge and information provided to me by other law enforcement officers. This Affidavit is being submitted for the limited purpose of establishing probable cause for the proposed complaint, and as such does not contain every fact known to me. I respectfully submit that based upon the facts presented below, that there is probable cause to believe that Clementa JOHNSON Jr., with a date of birth of December 12, 1976, committed the offenses of stalking, in violation of Title 18, United States Code, Sections 2261A and 2; and use of a firearm in furtherance of a crime of violence, in violation of Title 18, United States Code, Section 924(c) and 2.

**PROBABLE CAUSE**

***Background***

4. Since July of 2022, several law enforcement agencies have been assisting in the investigation of a series of events that targeted VICTIM 1, a resident of Miami-Dade County, and her sister VICTIM 2. These events include an apparent poisoning, two separate vehicle arsons at VICTIM 2's residence in Miami, a hit and run at VICTIM 1's residence in Pinecrest, Florida (hereinafter, "VICTIM 1's Residence"), and the mailing of a threatening letter to VICTIM 1 all occurring between as early as 2019 and through on or about September 26, 2023.

5. Specifically, as to the hit and run that occurred at VICTIM 1's Residence on August 30, 2023, law enforcement responded after a Home Depot rental truck rammed into the side of a vehicle operated by VICTIM 1 and then fled the scene. The incident was captured on VICTIM 1's home video surveillance system. The investigation revealed that the Home Depot truck was rented at the Coconut Grove Home Depot in Miami-Dade County, where Edner ETIENNE exited a truck registered to Michael DULFO and drove the Home Depot truck out of the parking lot. License plate reader (LPR) data revealed that DULFO's truck followed VICTIM 1's vehicle as she left downtown Miami from a court hearing involving her divorce proceeding from her estranged husband.

6. In addition to DULFO and ETIENNE, the investigation revealed that DULFO was communicating with Jerren HOWARD and Bayron BENNETT. BENNETT, DULFO, HOWARD, and ETIENNE were originally charged by complaint, Case Numbers 24-mj-02454-LMR and 24-mj-02460-LMR, and later indicted for Stalking, Arson, and Use of an Interstate Facility in Aid of Racketeering, in Case Number 24- CR-20110-GAYLES.

*The Assault with a Firearm: June 23, 2024*

7. On June 23, 2024, at approximately 8:45 am, VICTIM 1, departed her residence in her vehicle. At approximately 11:30 am, VICTIM 1 returned to her residence and momentarily idled in her driveway while she waited for the gate on the west side of the house to open. As VICTIM 1 began to pull into the driveway, she observed a black male individual (“SUBJECT 1”), brandishing a firearm and running toward her vehicle. In fear for her safety, and in an attempt to get away, VICTIM 1 drove into her backyard, scraping the sides of her car between a tree and a fence. VICTIM 1 continuously engaged the horn of her car as she attempted to get away. SUBJECT 1 pursued her vehicle by foot and ran into the backyard before he turned around and ran back toward the front.

8. During this time, VICTIM 1’s daughter, VICTIM 3, was inside VICTIM 1’s Residence when she heard a loud crash and a vehicle honking. VICTIM 3 exited the west door of VICTIM 1’s Residence and ran toward the front of the house. As she reached the open gate, VICTIM 3 noticed a black pickup truck parked on the street. SUBJECT 1, coming from the back of the house, ran up behind VICTIM 3 and pointed a firearm at VICTIM 3’s head. Upon SUBJECT 1’s approach, VICTIM 3 turned around and saw SUBJECT 1 as he pointed a silver pistol inches from her face. SUBJECT 1 grabbed VICTIM 3’s arm and told her to go back into the house. VICTIM 3 then ran back toward the exit she came from.

9. SUBJECT 1 ran across the front yard of VICTIM 1’s Residence toward the east side of the property. Moments later, SUBJECT 1 turned back, ran across the yard, and entered the back passenger side of a black Dodge Ram pickup truck (“Dodge Ram”). The Dodge Ram then rapidly departed the vicinity reasonably indicating an additional individual, SUBJECT 2, acting as the getaway driver.

10. VICTIM 1's Residence is equipped with surveillance cameras affixed around the property that captured the incident. The footage showed VICTIM 1 as she arrived at her residence and waited for the gate to open. Footage of the Dodge Ram is captured as it arrived and stopped on the street next to VICTIM 1's Residence. SUBJECT 1, wearing a light-colored t-shirt, shorts, yellow-colored boots, a beanie, and a face covering, exited the Dodge Ram's back passenger side and ran up to VICTIM 1. SUBJECT 1 could be seen holding what appeared to be a firearm in his right hand. Surveillance footage captured VICTIM 1 drive her vehicle toward the backyard, and SUBJECT 1 pursued her on foot. Footage also captured VICTIM 3 as she exited the residence and SUBJECT 1 approached her from behind and pointed a firearm at her head. Surveillance footage also captured SUBJECT 1 grab VICTIM 3 by the arm.

11. A video canvass of the neighborhood revealed that on June 23, 2024, at approximately 8:46 am, the Dodge Ram arrived and parked on the north side of SW 96 Street, approximately one block east of VICTIM 1's Residence. The Dodge Ram followed closely behind a white Tesla (the "Tesla"). The Tesla continued west on SW 96th Street, passing VICTIM 1's Residence. Less than two minutes later, the Tesla traveled east on SW 96th Street, passing VICTIM 1's Residence again. The Tesla continued east, passing the Dodge Ram, which then immediately departed and followed closely behind the white Tesla as they both turned north on SW 67th Avenue. At approximately 8:56 am, the Dodge Ram returned to the same spot it had previously parked and did not depart until approximately 11:30 am, when VICTIM 1 returned to her residence.

12. In my training and experience, it is common for criminals to use multiple cars to commit crimes. In this case, the close proximity of the white Tesla to the Dodge Ram over time,

distance, and change of direction indicates a direct relationship between the Dodge Ram occupants and the white Tesla occupant(s).

***Identification and Movement of Vehicles***

13. A further analysis of surveillance video obtained from the vicinity of VICTIM 1's Residence of the white Tesla revealed Florida license plate DI0RI affixed to the rear of the vehicle. This plate is registered to Diori BARNARD. A database search showed BARNARD's registered residential address to be located at 2427 NW 131 Circle, Miami, Florida. BARNARD is currently charged by criminal complaint with violations of federal law including, possession of more than 50 grams of methamphetamine and a detectable amount of cocaine, possession of a firearm in furtherance of a drug trafficking crime, and felon in possession of a firearm. *See* 24-mj-03234-Reid.

14. On June 24, 2024, surveillance was conducted at BARNARD's residence. Parked outside was a white Chevrolet Tahoe, bearing Florida license plate BN50WL. A Florida driver and vehicle identification database query revealed the Tahoe is registered to BARNARD. Upon reviewing LPR reader images, on May 3, 2024, an LPR reader collected an image of BARNARD's residence that captured the white Tahoe next to a black Dodge Ram with chrome bumpers, similar in description to the Dodge Ram seen around VICTIM 1's Residence on June 23, 2024. In this image, an after-market LED light is visible on the Dodge Ram's front bumper.

15. The afternoon of June 24, 2024, FBI surveillance recovered the Dodge Ram, with Florida license plate BP16UV, abandoned in the vicinity of SW 70th Avenue and SW 80th Street nearby VICTIM 1's Residence. Law enforcement observed an after-market LED light affixed to the Dodge Ram's front bumper, in the same place as the one seen on the Dodge Ram at BARNARD's residence. The VIN associated with the Dodge Ram, 1C6RREBG1MN533057, is

reported stolen. Based on my training and experience, perpetrators of violent crimes often use a stolen vehicle to commit the crime, and an additional vehicle, in this case the white Tesla, to attempt to avoid detection and escape the scene of the crime.

16. Law enforcement queried for stolen vehicles and received an Orange County Sheriff's Department (FL) report stating that the Dodge Ram was stolen in the vicinity of Orlando, FL, in the early morning hours of March 31, 2024. Also contained in that report, S.H., the owner of the Dodge Ram, stated the vehicle can be differentiated from similar models, by an LED strobe light affixed to the front bumper.

17. Florida License Plate BP16UV, also reported stolen, is associated with a 2013 orange Toyota Corolla<sup>1</sup>. Law enforcement located and interviewed, A.O., the owner associated with Florida tag BP16UV. Upon locating A.O., his vehicle, a blue Dodge Ram, was parked in the lot with Florida license plate 85BMPA affixed to the rear. A.O. acknowledged the current plate on his truck was not his and he had no knowledge of how that plate got on his vehicle. A.O. told law enforcement that he had recently visited a Walmart. Law enforcement photographed and seized the plate for processing. In my training and experience, perpetrators of crimes involving vehicles will try to avoid detection by using stolen vehicles and switching the license plate affixed to a vehicle used for criminal purposes to conceal the vehicle's identity.

18. An LPR review of Florida plate 85BMPA revealed that on June 19, 2024, at 8:41 pm, A.O.'s blue Dodge Ram was parked at a Walmart in Miami, Florida. An LPR review also documented a Mazda C-30, parked in the same Walmart at 8:42 pm. A review of the Walmart surveillance footage showed the white Tesla driving with the Mazda C-30 and pulling up to the

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<sup>1</sup> It should be noted that during the interview of the owners of the blue Dodge Ram and orange Toyota Corolla, it was discovered that they have two license plates (BP16UV and BP13UV) that were improperly affixed to their vehicles.



blue Dodge Ram. Based on the driving pattern, parking location, and time spent in the parking lot without entering the store, it is reasonable to believe that the occupants of the white Tesla and occupants of the Mazda C-30 worked together to steal a license plate off of a similar make, model, and color vehicle in order to place the mis-attributable license plate on the Dodge Ram.

19. On June 24, 2024, FBI located and seized the white Tesla with the license plate “DI0RI” affixed to the rear of the vehicle. A federal search warrant (24-mj-03231-Reid) was obtained, and on June 25, 2024, law enforcement extracted footage recorded by the Tesla’s onboard computer system, which included multiple cameras capturing exterior footage. Footage from June 8, 2024, revealed the white Tesla parked in the driveway of BARNARD’s residence. Parked next to the Tesla was a black Dodge Ram with chrome accents and black rims, matching the description of the Dodge Ram. The white Tesla footage showed JOHNSON as he was in and out of the passenger side of the Dodge Ram. Footage from June 20, 2024, at approximately 2:30 pm, revealed JOHNSON entering the driver’s side and departing in a light-colored Mazda C-30.

***Johnson’s Telephone Number and the Mazda C-30***

20. As early as February 2024, and as recent as Friday, June 28, 2024, JOHNSON has been in contact with law enforcement using a cellular device assigned telephone number 448-207-5007<sup>2</sup>. During these contacts, JOHNSON calls and messages on different days and different times of the day. JOHNSON has expressed that if law enforcement wishes to contact him, they should do so using the 448-207-5007 telephone number. Based on JOHNSON’s contact with law enforcement over the past several months using telephone number 448-207-5007, I believe he is the owner and user of the device.

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<sup>2</sup> A subpoena to the carrier requesting subscriber information is still pending.

21. A query of Hard Rock casino gambling accounts revealed that JOHNSON has an active player account assigned to him. Included in JOHNSON's player account information is telephone number 448-207-5007 as JOHNSON's phone number. A further review of account activity and surveillance footage revealed JOHNSON arrived at the Hard Rock casino on June 21, 2024, at 8:40 a.m. JOHNSON arrived alone in a light-colored Mazda C-30, bearing Florida license plate 95BKCV, "SUBJECT VEHICLE 2". SUBJECT VEHICLE 2's vehicle identification number (VIN) is 3MVDMBDM1RM648633 and is registered to P.V. Holding Corp, a car rental company. JOHNSON departed the casino as the driver and sole occupant of SUBJECT VEHICLE 2.

22. Records check at P.V. Holding Corp, revealed SUBJECT VEHICLE 2 was rented on June 14, 2024, to Diori BARNARD. This vehicle was scheduled to be returned on June 21, 2024, but was not returned until June 28, 2024.

23. A review of LPR database checks for the Mazda C-30 license plate revealed its location on June 21, 2024, at 7:56:52 pm, in the vicinity of 6731 Killian Drive, Pinecrest, Florida. The Mazda C-30 was immediately behind the stolen Dodge Ram which hit the LPR at 7:56:57 pm. This location is approximately 1.3 miles south of VICTIM 1's Residence.

24. Additional LPR records indicate that on June 22, 2024, SUBJECT VEHICLE 2 is recorded by the Monroe County Sheriff's Office – Key Largo South LPR, located immediately over the Route 1 bridge onto Key Largo. In an interview with VICTIM 1, law enforcement learned that she was in Key Largo on the evening of June 22, 2024, with a reservation to stay at Bakers Cary Resort ("Resort"). On June 28, 2024, pursuant to a federal search warrant of the Dodge Ram (24-mj-03262-Reid) law enforcement searched the Dodge Ram and recovered a Resort valet pass

with an arrival date of June 22, 2024, and a departure date of June 26, 2024<sup>3</sup>. Law enforcement reviewed security footage provided by the Resort and observed the Dodge Ram and BARNARD's white Tahoe follow VICTIM 1 into the Resort's parking area through the Resort's front gate.

25. On June 28, 2024, pursuant to a federal search warrant (24-mj-03261-Reid), law enforcement obtained BARNARD's historical cell site data from his provider. Upon review of these records, law enforcement learned that BARNARD called JOHNSON on the evening of June 22, 2024, while in the vicinity of VICTIM 1's Residence. On June 23, 2024, prior to driving the white Tesla to VICTIM 1's Residence, BARNARD contacted JOHNSON. BARNARD again contacted JOHNSON upon the white Tesla and the Dodge Ram's arrival outside VICTIM 1's Residence. JOHNSON, BARNARD, and additional unidentified phone numbers<sup>4</sup> then appear to join a group phone call shortly thereafter while the Dodge Ram and the white Tesla are down the street from VICTIM 1's Residence. I believe that the timing of this phone call in conjunction with the sequence of events as observed on residential surveillance footage indicates that the individuals inside the vehicles were coordinating their eventual attack on VICTIM 1.

26. Pursuant to a federal search warrant (24-mj-03291-Reid) for historical cell site data associated with the cellular device assigned telephone number 448-207-5007, law enforcement plotted relevant dates and times of interest (June 22 and 23, 2024) which revealed the cellular device was connecting to cell phone towers in the vicinity of VICTIM 1's Residence, Calvary Chapel Miami, and the Resort.

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<sup>3</sup> During an interview with Resort employees, law enforcement learned that in order to obtain a Resort valet pass with an arrival and departure date one must have an existing reservation with the Resort. A subpoena for Resort records is pending, however, the hotel at first review was unable to find a reservation associated with the valet pass in question.

<sup>4</sup> A subpoena is pending with the carrier to identify these numbers.

27. On June 22, 2024, between approximately 7:55 p.m. and 8:50 p.m., cellular device assigned telephone number 448-207-5007 utilized cellphone towers in the vicinity of Homestead, Florida. During this time there were six phone calls between 448-207-5007 and BARNARD. Between approximately 9:29 p.m. and 9:44 p.m., cellular device assigned telephone number 448-207-5007 utilized cellphone towers in the vicinity of the Resort in Key Largo, Florida. Upon arriving in the vicinity of the Resort, cellular device assigned telephone number 448-207-5007 received a phone call from BARNARD.

28. On June 23, 2024, at approximately 6:43 a.m., 6:59 a.m., 7:35 a.m., and again at 8:36 a.m. the cellular device connected to cellular towers in the vicinity of VICTIM 1's Residence. Of these connections, four are telephone calls all of which are with BARNARD. At approximately 8:58 a.m. cellular device assigned telephone number 448-207-5007, utilizes a cellular tower north of VICTIM 1's Residence and then at approximately 9:10 a.m. it utilizes a cellular tower in the vicinity of Calvary Chapel Miami, a church where the victim was located that morning. Calvary Chapel Miami is more than 10 miles away from VICTIM 1's Residence. Between 10:03 a.m. and 10:30 a.m., while in the vicinity of Calvary Chapel Miami, the cellular device communicates with BARNARD. The cellular device remained in the area of Calvary Chapel Miami until approximately 10:45 a.m. which is consistent with VICTIM 1's location. In my training and experience, it is common for individuals engaged in criminal activity involving multiple co-conspirators to use cellular devices to coordinate their criminal activity while mobile. Specifically, like in this case, where there are individuals in multiple vehicles, it is reasonable to believe that they are communicating with one another to coordinate their efforts using cellular devices. Based on the consistent pattern of telephonic communication, while in close proximity to one another, and VICTIM 1, it is reasonable to believe that BARNARD and JOHNSON spent June 21,

22, and 23 stalking VICTIM 1 in an effort to find an opportunity to commit a crime of violence with a firearm, as indicated by the events that took place outside VICTIM 1's Residence on the morning of June 23, 2024.

**CONCLUSION**

29. Based upon the foregoing, I submit that there is probable cause for the proposed complaint charging JOHNSON Jr. with the offenses of stalking, in violation of Title 18, United States Code, Sections 2261A and 2; and use of a firearm in furtherance of a crime of violence, in violation of Title 18, United States Code, Section 924(c) and 2.

FURTEHR AFFIANT SAYETH NAUGHT.



\_\_\_\_\_  
CONOR GOEPEL  
SPECIAL AGENT  
FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1  
by Face Time this 1st day of July 2024.



\_\_\_\_\_  
HONORABLE JONATHAN GOODMAN  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF FLORIDA